

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF
PENNSYLVANIA, By Michelle A. Henry,
Attorney General,

Plaintiff,

vs.

PROSPECT MEDICAL HOLDINGS,
INC., PROSPECT CROZER, LLC,
LEONARD GREEN AND PARTNERS,
SAMUEL LEE, Individually, and DAVID
TOPPER, Individually,

Defendants.

CIVIL ACTION

Case No. 2:24-cv-05853-JP

DEFENDANTS LEE AND TOPPER'S

NOTICE OF CONSENT TO REMAND

In response to the Court's February 12, 2025 Order (Dkt. 39) and in light of the Stipulation to Remand by the Commonwealth and Defendants Prospect Medical Holdings, Inc. and Prospect Crozer, LLC, Defendants Samuel Lee and David Topper hereby notify this Court of their consent to remand the instant case to the Court of Common Pleas of Delaware County, case number CV-2024-009428.

Respectfully submitted,

DATED: February 14, 2025

Bird, Marella, Rhow,
Lincenberg, Drooks & Nessim, LLP

By: /s/ Devon E. Porter

Ekwan E. Rhow, Esquire

Admitted Pro Hac Vice

Devon E. Porter, Esquire (PA Bar #327898)

1875 Century Park East, 23rd Floor, Los
Angeles, California 90067-2561

Tel: 310.201.2100

erhow@birdmarella.com

dporter@birdmarella.com

Attorneys for Defendants Samuel Lee and
David Topper